



Montana Environmental Trust Group, LLC
Trustee of the Montana Environmental Custodial Trust
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By Electronic Mail

December 27, 2014

Betsy Burns
RCRA Project Officer
US Environmental Protection Agency—Region 8
Montana Office
10 West 15th Street, Suite 3200
Helena, Montana 59626

RE: Final 2015—2016 Budget for East Helena Cleanup (EHCU) Account
Montana Environmental Custodial Trust

Dear Betsy:

Pursuant to ¶16.g of the Consent Decree and Settlement Agreement Regarding the Montana Sites (the Settlement Agreement) and in response to your December 22, 2014 request, the Montana Environmental Trust Group, LLC, Trustee of the Montana Environmental Custodial Trust (the Custodial Trust), hereby submits the final East Helena Cleanup (EHCU) Account budget for environmental actions to be performed in 2015 and certain environmental actions to be performed in 2016 (the Final 2015—2016 Budget). The Final 2015—2016 Budget for the EHCU Account, set forth in the attached Table 1, is submitted to the United States Environmental Protection Agency (EPA) as Lead Agency for the East Helena Designated Property.

Based on your December 22, 2014 email and as detailed in Table 1, the Custodial Trust understands the following.

- EPA has approved a total budget of \$5,130,842 for environmental actions in 2015.
- EPA has conditionally approved a budget estimate of \$980,000 for certain 2015 environmental actions that must be individually approved by EPA pursuant to the EHCU Account budget protocols (the EHCU Account Budget Protocols).
- EPA has conditionally approved a budget estimate of \$25,525,000 for certain construction activities that are environmental actions to be performed in 2015 and 2016, subject to the EHCU Account Budget Protocols.

Pursuant to the requirements of ¶16.g of the Settlement Agreement, the Custodial Trust has prepared an estimate of projected expenditures for first quarter of 2016 (see Table 2). Please note that the first quarter estimate does not include budget line items that are subject to the EHCUC Account Budget Protocols.

Thank you for your approval of the Final 2015—2016 Budget and best wishes for a happy New Year.

Sincerely,

Montana Environmental Trust Group, LLC
Trustee of the Montana Environmental Custodial Trust
By: Greenfield Environmental Trust Group, Inc., Member
By: Cynthia Brooks, President

Attachments

cc: Julie DalSoglio—EPA
Chuck Figur—EPA
Lauri Gorton—Custodial Trust
Jennifer Roberts—Custodial Trust
Joe Vranka—EPA
Marc Weinreich—Custodial Trust

Table 1 - Montana Environmental Custodial Trust East Helena Clean-Up Account - Final 2015 & Partial 2016 Final Budget December 27, 2014									
Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2014 Original Budget (F8)	2014 EPA Approved Budget as of 11/30/2014	2015 Preliminary Budget	2015/2016 Preliminary Construction Budget	2015 Final Budget	2015/2016 Final Construction Budget	Comments
							2015 Budget Line Items Requiring Prior EPA Approval		Budget line items highlighted in blue have not been fully scoped, costed and/or financially committed by the Custodial Trust. Prior to incurring any charges or making contractual commitments in connection with these activities, the Custodial Trust will secure the prior written approval of EPA.
A HDS Water Treatment Plant	1. Water Treatment O&M/Regulatory Compliance	II.A.1	\$231,000	\$231,000	\$257,375		\$257,375		Budget includes costs to: treat stormwater and 2015 construction de-watering water; renew MPDES permit; and enter into AOC with MDEQ
	Subtotal WTP - II.A		\$231,000	\$231,000	\$257,375	\$0	\$257,375	\$0	
B General Site Operations & Maintenance	1. Operations & Maintenance	II.B.1	\$95,100	\$95,100	\$111,850		\$111,850		Level funding from 2014 with reduced funding for utilities based on actual costs in 2014; combined costs with II.B.5 (Non-routine O&M) which were level funded from 2014. Level funding from 2014 with reduced funding for office supplies based on actual costs in 2014 Level funding from 2014 including one additional site-dedicated vehicle Combined with Cost Center II.B.1 (Routine O&M); recommend retiring Cost Center. Level funding from 2014 Level funding from 2014 with increased funding for janitorial and ground maintenance based on actual costs in 2014
	2. Office Operations	II.B.2	\$23,000	\$23,000	\$21,000		\$21,000		
	3. Health & Safety	II.B.3	\$61,650	\$61,650	\$25,850		\$25,850		
	5. Non-Routine O&M	II.B.5	\$27,650	\$27,650	\$0		\$0		
	6. Emergency Response	II.B.6	\$20,000	\$20,000	\$20,000		\$20,000		
	7. Site Office	II.B.7	\$6,000	\$6,000	\$9,500		\$9,500		
	Subtotal Site O&M - II.B		\$233,400	\$233,400	\$188,200	\$0	\$188,200	\$0	
C Waste Disposal	1. HDS	II.C.1	\$2,000	\$2,000	\$2,000		\$2,000		Level funding from 2014
	2. Contaminated Debris	II.C.2	\$9,650	\$9,650	\$9,650		\$9,650		Level funding from 2014
	3. Other Disposal	II.C.3	\$9,550	\$9,550	\$9,550		\$9,550		Level funding from 2014
	Subtotal Waste Disposal - II.C		\$21,200	\$21,200	\$21,200	\$0	\$21,200	\$0	
D Slag Reprocessing	1. Slag Pile Re-Processing	II.D.1	\$20,000	\$20,000	\$20,000		\$20,000		Level funding from 2014 assuming technical/operational support for increased slag sales
	Subtotal Slag Reprocessing - II.D		\$20,000	\$20,000	\$20,000	\$0	\$20,000	\$0	
E Tenants	2. Agricultural Tenants	II.E.2	\$5,000	\$5,000	\$0		\$0		Budget transferred to Administrative Account Cost Center I.F.1 - East Helena Site Security and Property Management Level funding from 2014 assuming continued support for community land uses
	4. Other Tenants/Land Use Matters	II.E.4	\$5,700	\$5,700	\$5,700		\$5,700		
	Subtotal Tenants - II.E		\$10,700	\$10,700	\$5,700	\$0	\$5,700	\$0	
F RCRA/CAMU Compliance	1. Reporting	II.F.1	\$2,000	\$2,000	\$2,000		\$2,000		Level funding from 2014 Budget includes funds for CAMU/liner inspections/repairs and ICS inspections/repairs at reduced levels based on actual costs in 2014 Budget includes costs for: mowing; weed control; seeding; and pumping leachate collection and leak detection. Activity completed in 2014. Recommend retiring Cost Center Budget includes costs to complete construction documentation and final close-out of CAMU#2. Budget assumes: design activities halted 10/2014; unspent design funds transferred from 2014 to 2015; and 2015 budget covers cost to complete 100% design and develop addendum package for implementation as part of ICS2 and ET Cover System construction, if appropriate. Budget based on consultant ROM estimate to construct 3-acre leachate evaporation pond.
	2. Inspections	II.F.2	\$10,000	\$10,000	\$5,000		\$5,000		
	5. CAMU O&M	II.F.5	\$15,000	\$15,000	\$33,820		\$33,820		
	6. CAMU Closure	II.F.6			\$0		\$0		
	a. Design	II.F.6.a	\$50,000	\$50,000	\$0		\$0		
	b. Final Cap Construction	II.F.6.b	\$2,103,572	\$0	\$12,500		\$12,500		
	7. CAMU Leachate Treatment System	II.F.7					\$0		
	a. Design	II.F.7.a	\$75,000	\$75,000	\$50,000		\$50,000		
	b. Construction	II.F.7.b	\$900,000	\$0	\$0	\$575,000	\$0	\$575,000	
	c. O&M	II.F.7.c	\$0	\$0	\$0		\$0		
	Subtotal RCRA Compliance - II.F		\$3,155,572	\$152,000	\$103,320	\$575,000	\$103,320	\$575,000	
I Risk Assessments	1. HHRA	II.I.1	\$25,000	\$25,000	\$25,000		\$25,000		Budget assumes LOE to perform screening level human health risk assessment as part of surface soil sampling evaluations of CMS parcels, assuming sampling/analysis completed in 2015 (covered under Cost Centers II.J.4.h.2. and II.J.4.h.3). Budget assumes LOE to perform screening level ecologic risk assessment as part of surface soil sampling evaluations of CMS parcels, assuming sampling/analysis completed in 2015 (covered under Cost Centers II.J.4.h.2. and II.J.4.h.3).
	2. BERA	II.I.2	\$25,000	\$25,000	\$25,000		\$25,000		
	Subtotal Risk Assessments - II.I		\$50,000	\$50,000	\$50,000	\$0	\$50,000	\$0	
J RCRA Corrective Action Implementation	1. South Plant Hydraulic Control (SPHC) IM	II.J.1							Budget based on consultant estimate to complete final design and construction documents Budget based on consultant estimate to address outstanding issues with FEMA, 310 and 404 permitting. Project complete in 2014. Recommend retiring Cost Center. Project complete in 2014. Recommend retiring Cost Center. Budget based on consultant engineer's cost estimate for PPC realignment construction in 2015/2016. Budget based on costs to implement O&M Plan (including routine inspections and minor repairs). Budget does not include funds for any major, unexpected repairs in 2015. Budget based on consultant estimate to update SWPPP for 2015 construction activities. Budget based on consultant estimate to coordinate and review NWE design. Project completed in 2014. Recommend retiring Cost Center. Budget based on consultant estimate to complete testing of topsoil and soil amendments required for final ET Cover design. Primary borrow testing completed in 2014.
	a. SPHC IM Design	II.J.1.a							
	4. PPC Realignment Design	II.J.1.a.4	\$275,000	\$275,000	\$60,000		\$60,000		
	7. PPC Realignment Permitting	II.J.1.a.7	\$140,000	\$140,000	\$25,000		\$25,000		
	8. North of HWY 12 Sediment Analysis	II.J.1.a.8	\$30,000	\$30,000	\$0		\$0		
	9. Army COE Peer Review	II.J.1.a.9	\$18,800	\$18,800	\$0		\$0		
	Subtotal SPHC IM Design - II.J.1.a		\$463,800	\$463,800	\$85,000	\$0	\$85,000	\$0	
	b. SPHC IM Construction	II.J.1.b							
	1. PPC Temporary Bypass Construction	II.J.1.b.1	\$35,000	\$35,000	\$0		\$0		
	3. COEH Water Main Construction	II.J.1.b.3	\$2,000	\$2,000	\$0		\$0		
	5. Easements and Rights-of-Way	II.J.1.b.5	\$30,000	\$30,000	\$30,000		\$30,000		
	6. Water Delivery - Negotiations	II.J.1.b.6	\$25,000	\$25,000	\$25,000		\$25,000		
	7. Water Delivery - Settlement	II.J.1.b.7	\$0	\$0	\$0		\$0		
	9. PPC Realignment Construction	II.J.1.b.9	\$0	\$0	\$0	\$12,700,000	\$0	\$12,700,000	
	Subtotal SPHC IM Construction - II.J.1.b		\$92,000	\$92,000	\$55,000	\$12,700,000	\$55,000	\$12,700,000	
	c. SPHC IM O&M	II.J.1.c							
	1. PPC Bypass O & M	II.J.1.c.1	\$100,000	\$100,000	\$50,000		\$50,000		
	Subtotal PPC Bypass O&M - II.J.1.c		\$100,000	\$100,000	\$50,000	\$0	\$50,000	\$0	
	Subtotal SPHC IM Design, Construction and O&M - II.J.1		\$655,800	\$655,800	\$190,000	\$12,700,000	\$190,000	\$12,700,000	
	2. ET Cover System IM	II.J.2							
	a. ET Cover System IM Design	II.J.2.a							
	3. ET Cover System, ICS 2 and Phase 3 Design	II.J.2.a.3	\$85,000	\$85,000	\$80,000		\$80,000		
	4. Stormwater Management/Permitting	II.J.2.a.4	\$45,000	\$45,000	\$45,000		\$45,000		
	5. NW Energy Coordination	II.J.2.a.5	\$20,000	\$20,000	\$25,000		\$25,000		
	8. ICS 1 Design, Bid and Award	II.J.2.a.8	\$237,000	\$237,000	\$0		\$0		
	9. Source Material Sampling & Analysis	II.J.2.a.9	\$50,000	\$50,000	\$25,000		\$25,000		
	Subtotal ET Cover System IM Design - II.J.2.a		\$437,000	\$437,000	\$175,000	\$0	\$175,000	\$0	

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J RCRA Corrective Action Implementation	b. ET Cover System IM Construction	II.J.2.b							
	1. Demolition Phase 1 Construction	II.J.2.b.1	\$2,000	\$2,000	\$0		\$0		Project completed in 2014. Recommend retiring Cost Center.
	2. Demolition Phase 2 Construction	II.J.2.b.3	\$8,000	\$8,000	\$0		\$0		Project completed in 2014. Recommend retiring Cost Center.
	7. NW Energy Utility Relocate	II.J.2.b.7	\$500,000	\$0	\$500,000		\$500,000		Budget based on NWE conceptual design cost estimate
	8. ICS 1 Construction	II.J.2.b.8	\$1,248,000	\$2,314,406	\$30,000		\$30,000		Budget based on consultant estimate to complete and finalize all construction documents and O&M Plan.
	9. ET Cover, ICS 2 and Phase 3 Demo Construction	II.J.2.b.9	\$0	\$0	\$0	\$8,000,000	\$0	\$8,000,000	Budget based on consultant's updated ROM cost estimate for 2015/2016 construction of ET Cover, ICS2 and Phase 3 Demo.
	Subtotal ET Cover System IM Construction - II.J.2.b		\$1,758,000	\$2,324,406	\$530,000		\$530,000	\$8,000,000	
	c. ET Cover System O&M	II.J.2.c							
	1. ET Cover System/ICS O & M	II.J.2.c.1	\$100,000	\$100,000	\$25,000		\$25,000		Budget based on estimate to implement O&M Plan (covered in Cost Center II.J.2.b.8) assuming: no major repairs required for ICS1; maintenance handled by ICS and ET Cover System construction contractors during construction season; and O&M activities required during six-month during non-construction season.
	Subtotal PPC Bypass O&M - II.J.2.c		\$100,000	\$100,000	\$25,000		\$25,000	\$0	
	Subtotal ET Cover System IM Design, Construction and O&M - II.J.2		\$2,295,000	\$2,861,406	\$730,000		\$730,000	\$8,000,000	
	3. Source Removal IM	II.J.3							
	a. Source Removal IM Design	II.J.3.a							
	1. Source Removal Decision Model	II.J.3.a.1	\$15,000	\$15,000	\$15,000		\$15,000		Budget covers costs for additional evaluations to address beneficiary comments on CMS WP.
	3. Source Removal Design	II.J.3.a.3							
	i. Preliminary	II.J.3.a.3.i	\$0	\$0	\$130,000		\$130,000		Budget covers costs to develop conceptual design for select source removal in west selenium area.
	ii. Final	II.J.3.a.3.ii	\$0	\$0	\$0	\$800,000	\$0	\$800,000	Budget covers 2015/2016 costs to prepare final design, bid packages and handle procurement for source removal in west selenium area.
	5. Tito Park Permitting	II.J.3.a.5	\$25,000	\$25,000	\$10,000		\$10,000		Based on consultant estimate to coordinate with MDEQ on ongoing water quality monitoring of TPA water quality discharge to PPC.
	6. Wilson Ditch Remedy	II.J.3.a.6	\$40,000	\$0	\$40,000		\$40,000		Budget covers costs to design/plan for Wilson Ditch source removal (on CT property). Work and budget transferred from 2014 to 2015.
	Subtotal Source Removal IM Design - II.J.3.a		\$80,000	\$40,000	\$195,000		\$195,000	\$800,000	
	b. Source Removal IM Construction	II.J.3.b							
	1. Tito Park Construction	II.J.3.b.1	\$3,840,000	\$2,419,538	\$20,000		\$20,000		Budget based on consultants' estimates to complete and finalize all construction documents and O&M Plan.
	2. Wilson Ditch Remediation	II.J.3.b.2	\$350,000	\$0	\$0	\$350,000	\$0	\$350,000	Budget assumes excavation of 3600 ft of Wilson Ditch (over 24-day period). Work and budget transferred from 2014 to 2015.
	3. Source Removal	II.J.3.b.3	\$0	\$0	\$0	\$3,100,000	\$0	\$3,100,000	Budget covers preliminary estimated costs to remove source material from west selenium area in 2015 and 2016. Placeholder pending completion of source evaluation.
	Subtotal Source Removal IM Construction - II.J.3.b		\$4,190,000	\$2,419,538	\$20,000	\$3,450,000	\$20,000	\$3,450,000	
	c. Source Removal O&M	II.J.3.c							
	1. Tito Park O & M	II.J.3.c.1	\$0	\$0	\$25,000		\$25,000		Budget assumes: routine inspections per O&M Plan (to be prepared as part of Cost Center II.J.3.b.1 scope and budget); no major repairs required; maintenance handled by construction contractors during construction season; and O&M activities required during six-month non-construction season.
	Subtotal Source Removal O&M - II.J.3.c		\$0	\$0	\$25,000	\$0	\$25,000	\$0	
	Subtotal Source Removal IM Design, Construction and O&M - II.J.3		\$4,270,000	\$2,459,538	\$240,000	\$4,250,000	\$240,000	\$4,250,000	
	4. IM/RCRA Support	II.J.4							
	a. IM Work Plan(s)	II.J.4.a	\$100,000	\$100,000	\$75,000		\$75,000		Budget based on consultant estimate to finalize 2015/2016 IMWP plus additional funds to prepare IMWP addendum(s) for potential additional remedies.
	b. Corrective Measures Study	II.J.4.b							
	1. CMS Work Plan	II.J.4.b.1	\$85,000	\$85,000	\$15,000		\$15,000		Budget based on consultant estimate to finalize CMS WP
	2. Source Area Evaluations/Studies	II.J.4.b.2	\$0	\$130,000	\$200,000		\$200,000		Budget assumes that scope will be developed as part of Tier II evaluations (covered under Cost Center II.J.4.b.4) that could include additional site investigations to support Tier II groundwater remedy evaluations and/or further design of Tier II remedies (such as a PRB) and that 2015 activities could include: additional soil borings and/or monitoring wells; soil sampling and testing; aquifer testing; groundwater/soil treatability testing; and additional investigations of the slag pile.
	3. GW Flow/Contaminant Transport Modeling	II.J.4.b.3	\$175,000	\$225,000	\$250,000		\$250,000		Budget based on consultant estimate to perform additional contaminant transport modeling required to support the CGWA, IMs, Tier II evaluations, etc.
	4. Tier II GW Evaluations	II.J.4.b.4	\$75,000	\$75,000	\$73,000		\$73,000		Budget based on consultant estimate to: complete Tier II Phase 2 evaluations; prepare written deliverable of results and recommendations; and present findings to beneficiaries. (Charges previously captured under Cost Center II.J.4.f.)
	5. Conceptual Site Models	II.J.4.b.5	\$0	\$0	\$10,000		\$10,000		Budget based on consultant estimate to refine CSMS. (Charges previously captured under Cost Center II.J.4.i.)
	6. Comprehensive GW Plan and Strategy	II.J.4.b.6	\$50,000	\$50,000	\$75,000		\$75,000		Budget based on consultant estimate for 2015 planning and strategy. (Charges previously captured under Cost Center II.J.4.k.)
	7. 2015 CAMP	II.J.4.b.7							Charges previously captured under Cost Center II.J.4.e
	i. Analytical Services	II.J.4.b.7.i	\$125,000	\$125,000	\$150,000		\$150,000		Budget based on consultant estimate for 2015 CAMP laboratory costs. (Charges previously captured under Cost Center II.J.4.e.1.)
	ii. Database Management	II.J.4.b.7.ii	\$50,000	\$50,000	\$50,000		\$50,000		Budget assumes level funding from 2014. (Charges previously captured under Cost Center II.J.4.e.2.)
	iii. Well Integrity Survey and Repairs	II.J.4.b.7.iii	\$0	\$10,000	\$20,000		\$20,000		Budget based on consultant estimate to survey and repair wells. (Charges previously captured under Cost Center II.J.4.e.3.)
	iv. CAMP Implement & GS/SW Characterization	II.J.4.b.7.iv	\$200,000	\$200,000	\$325,000		\$325,000		Budget based on consultant estimate for: sampling and data collection; ongoing data review/analysis; evaluation and bi-monthly distribution of groundwater/surface water quality data; semi-annual arsenic, selenium and other potential COPC plume maps; and ongoing updates to trending data for all monitoring wells. (Charges previously captured under Cost Center II.J.4.e.4.)
	v. Planning and Reporting	II.J.4.b.7.v	\$0	\$0	\$43,000		\$43,000		Budget based on consultant estimate for preparing monitoring plan and data summary reports. (Charges previously captured under Cost Center II.J.4.e.5.)
	d. Controlled GW Area (CGWA)	II.J.4.d	\$150,000	\$150,000	\$258,000		\$258,000		Budget covers costs for: revisions to CGWA petition; collect additional data to support CGWA petition approval; participate in meetings for CGWA; and converting 12 East Helena residences from private well water to COEH water @ ~\$12k per well.
	g. Long-term Planning	II.J.4.g							
	1. Scoping	II.J.4.g.1	\$75,000	\$75,000	\$50,000		\$50,000		Budget based on consultant estimate to scope long-term technical plans.
	2. Technical and Financial Plan	II.J.4.g.2	\$100,000	\$50,000	\$50,000		\$50,000		Budget based on consultant estimate to update and revise financial forecasting tools and evaluations.
	h. Phase II RFI/Soil Characterization (CMS Parcels)	II.J.4.h							
	1. Finalize Phase II RFI	II.J.4.h.1	\$5,000	\$5,000	\$0		\$0		Activities completed in 2014. Recommend retiring Cost Center.
	2. Scoping	II.J.4.h.2	\$50,000	\$50,000	\$10,000		\$10,000		Budget based on consultant estimate to prepare SAP for CMS parcels.
	3. Implementation	II.J.4.h.3	\$200,000	\$0	\$200,000		\$200,000		Budget based on ROM consultant estimate to implement CMS parcel sampling, analysis and reporting.
	j. Efforts to Avoid MBTA Non-Compliance	II.J.4.j	\$150,000	\$0	\$100,000		\$100,000		Budget based on consultant estimate to implement 2015 MBTA actions and activities.
	Subtotal IM/RCRA Support - II.J.4		\$1,590,000	\$1,380,000	\$1,954,000	\$0	\$1,954,000	\$0	

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J RCRA Corrective Action Implementation	5. Design Management/Execution	II.J.5							
	a. Project Management/IM Development	II.J.5.a	\$385,000	\$385,000	\$390,000		\$390,000		Budget assumes level funding from 2014.
	b. Schedule	II.J.5.b	\$74,000	\$74,000	\$51,000		\$51,000		Budget based on consultant estimate for program-wide scheduling deliverables.
	c. Financial Affairs and Management Reports	II.J.5.c	\$151,000	\$151,000	\$115,000		\$115,000		Budget based on consultant estimate for routine project financial reporting, invoicing and other project controls.
	d. Sub-contracting	II.J.5.d	\$41,000	\$41,000	\$31,000		\$31,000		Budget based on consultant estimate to administer/manage multiple subcontracts.
	f. Direct Expenses	II.J.5.f	\$49,000	\$49,000	\$30,000		\$30,000		
	h. Project Insurance Premium	II.J.5.h	\$85,000	\$83,500	\$200,000		\$200,000		Budget assumes higher premium costs for increase in construction costs for 2015.
	j. IM Operations and Support	II.J.5.j	\$27,000	\$27,000	\$73,000		\$73,000		Budget covers costs for site operators and other contractors to support site demolition and other IM activities. Budget increase from 2014 reflects significant increase in construction activities in 2015.
	Subtotal Design Management/Execution - II.J.5		\$812,000	\$810,500	\$890,000	\$0	\$890,000	\$0	
	Total All IMs Design & Construction - II.J		\$9,622,800	\$8,167,244	\$4,004,000	\$24,950,000	\$4,004,000	\$24,950,000	
K Documents & Records	1. System Set-up	II.K.1	\$33,500	\$33,500	\$23,500		\$23,500		Budget covers costs to finalize set up of on-line document system (VDR) (Alfresco). Unexpended funds from 2014 transferred to 2015.
	3. System Maintenance	II.K.3	\$36,000	\$36,000	\$36,000		\$36,000		Budget covers estimated costs to maintain Alfresco system.
	Subtotal Documents & Records - II.K		\$69,500	\$69,500	\$59,500	\$0	\$59,500	\$0	
M CERCLA Compliance	1. CERCLA/ROD Compliance	II.M.X	\$76,440	\$76,440	\$76,800		\$76,800		Budget includes costs for: East Fields soil repository erosion control measures; management and maintenance of mini-soil repository; and weed control.
	Subtotal CERCLA Compliance - II.M		\$76,440	\$76,440	\$76,800	\$0	\$76,800	\$0	
N Financial Affairs	1. CPA Services	II.N.1	\$45,000	\$45,000	\$45,000		\$45,000		Level funding from 2014.
	2. Design and Construction Audit Service	II.N.4	\$60,000	\$0	\$60,000		\$60,000		Budget based on estimated cost for third-party audit of engineering design and construction services.
	Subtotal Financial Affairs - II.N		\$105,000	\$45,000	\$105,000	\$0	\$105,000	\$0	
O Redevelopment	1. Redevelopment Plans	II.O.1	\$20,000	\$0	\$10,000		\$10,000		Budget assumes limited land use planning support for 2015.
	2. Redevelopment Support	II.O.2	\$10,000	\$10,000	\$10,000		\$10,000		Level funding from 2014.
	3. Redevelopment Issues	II.O.3	\$25,000	\$0	\$10,000		\$10,000		Budget assumes limited technical/logistical support to address redevelopment issues and local land use regulations.
	Subtotal Redevelopment - II.O		\$55,000	\$10,000	\$30,000	\$0	\$30,000	\$0	
P Community Relations	1. General Meetings	II.P.1	\$4,000	\$4,000	\$4,000		\$4,000		Level funded from 2014.
	2. RCRA Annual Public Meeting	II.P.2	\$4,000	\$4,000	\$4,000		\$4,000		Level funded from 2014.
	3. East Helena Website	II.P.3	\$15,000	\$15,000	\$10,000		\$10,000		Budget covers costs to revise, upload and maintain website.
	4. Community Involvement/Relations Plan	II.P.4	\$40,000	\$0	\$20,000		\$20,000		Budget covers potential costs for support from community relations specialist.
	5. Other CR activities	II.P.5	\$15,000	\$15,000	\$35,000		\$35,000		Budget includes costs for: periodic newsletters and updates on project status; logistical and other support for community tours and meetings; updates to PPC video; and routine aerial photography.
	Subtotal Community Relations - II.P		\$78,000	\$38,000	\$73,000	\$0	\$73,000	\$0	
R Legal Support	1. Outside Council Fees & Expenses	II.R.1	\$84,000	\$84,000	\$67,080		\$67,080		Budget assumes reduced funding based on actual costs in 2014.
	2. In-house Legal Services	II.R.2	\$28,080	\$28,080	\$45,000		\$45,000		Budget based on actual 2014 hours.
	Subtotal Legal Support - II.R		\$112,080	\$112,080	\$112,080	\$0	\$112,080	\$0	
T Trust Project Management	4. GW and PPC Project Management	II.T.4	\$312,000	\$312,000	\$80,160		\$80,160		Budget assumes 0.35 FTE in 2015 (compared to 1.0 FTE in 2014).
	6. Compliance Manager	II.T.6	\$35,020	\$35,020	\$56,160		\$56,160		Budget assumes 0.25 FTE in 2015 (compared to 0.15 FTE in 2014).
	7. Operations Manager	II.T.7	\$92,400	\$92,400	\$87,750		\$87,750		Budget assumes 0.65 FTE in 2015 at reduced hourly rate (compared to 0.60 FTE in 2014).
	8. Operations Support Specialist	II.T.8	\$72,530	\$72,530	\$36,265		\$36,265		Budget assumes 0.5 FTE in 2015.
	9. Project Controls/Financial Affairs Coordinator	II.T.9	\$146,640	\$146,640	\$175,968		\$175,968		Budget assumes 0.65 FTE in 2015.
	11. Trustee Management EH Clean Up	II.T.11	\$517,920	\$517,920	\$439,764		\$439,764		Budget assumes: 0.33 FTE in 2015 for Trustee (compared to 0.5 FTE in 2014); and 0.75 FTE for RCRA Director (at same level as 2014)
	12. Trustee Land Use & Re-use	II.T.12	\$117,000	\$117,000	\$93,600		\$93,600		Budget assumes 0.2 FTE in 2015 for Trustee (compared to 0.25 in 2014).
	13. Trustee Travel and Directs	II.T.13	\$35,000	\$35,000	\$35,000		\$35,000		Budget assumes 14 trips at \$2,500 per trip.
	Subtotal Trustee Management - II.T		\$1,328,510	\$1,328,510	\$1,004,667	\$0	\$1,004,667	\$0	
Total Budget - East Helena Cleanup Account:			\$15,169,202	\$10,565,074	\$6,110,842	\$25,525,000	\$6,110,842	\$25,525,000	
Total Amounts That Require Prior EPA Approval:			\$10,211,572		\$980,000	\$25,525,000	\$980,000	\$25,525,000	
Final Budget East Helena Cleanup Account Excluding Amounts That Require Prior EPA Approval:			\$4,957,630		\$5,130,842	\$0	\$5,130,842	\$0	

Table 2 - Montana Environmental Custodial Trust East Helena Clean-Up Account - First Quarter 2016 Estimate December 27, 2014				
Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2015 Final Budget	First Quarter 2016 Estimate
A HDS Water Treatment Plant	1. Water Treatment O&M/Regulatory Compliance	II.A.1	\$257,375	\$64,344
	Subtotal WTP - II.A		\$257,375	\$64,344
B General Site Operations & Maintenance	1. Routine O&M	II.B.1	\$111,850	\$27,963
	2. Office Operations	II.B.2	\$21,000	\$5,250
	3. Health & Safety	II.B.3	\$25,850	\$6,463
	6. Emergency Response	II.B.6	\$20,000	\$5,000
	7. Site Office	II.B.7	\$9,500	\$2,375
	Subtotal Site O&M - II.B		\$188,200	\$47,050
C Waste Disposal	1. HDS	II.C.1	\$2,000	\$500
	2. Contaminated Debris	II.C.2	\$9,650	\$2,413
	3. Other Disposal	II.C.3	\$9,550	\$2,388
	Subtotal Waste Disposal - II.C		\$21,200	\$5,300
D Slag Reprocessing	1. Slag Pile Re-Processing	II.D.1	\$20,000	\$5,000
	Subtotal Slag Reprocessing - II.D		\$20,000	\$5,000
E Tenants	2. Agricultural Tenants	II.E.2	\$0	\$0
	4. Other Tenants/Land Use Matters	II.E.4	\$5,700	\$1,425
	Subtotal Tenants - II.E		\$5,700	\$1,425
F RCRA/CAMU Compliance	1. Reporting	II.F.1	\$2,000	\$500
	2. Inspections	II.F.2	\$5,000	\$1,250
	5. CAMU O&M	II.F.5	\$33,820	\$8,455
	6. CAMU Closure	II.F.6		
	a. Design	II.F.6.a	\$0	\$0
	b. Final Cap Construction	II.F.6.b	\$12,500	\$0
	7. CAMU Leachate Treatment System Construction	II.F.7		
	a. Design	II.F.7.a	\$50,000	\$0
	b. Construction	II.F.7.b	\$0	\$0
	Subtotal RCRA Compliance - II.F		\$103,320	\$10,205
I Risk Assessments	1. HHRA	II.I.1	\$25,000	\$6,250
	2. BERA	II.I.2	\$25,000	\$6,250
	Subtotal Risk Assessments - II.I		\$50,000	\$12,500
J Interim Measures (IMs) Planning, Engineering, Permitting & Construction	1. South Plant Hydraulic Control (SPHC) IM	II.J.1		
	a. SPHC IM Design	II.J.1.a		
	4. PPC Realignment Design	II.J.1.a.4	\$60,000	\$0
	7. PPC Realignment Permitting	II.J.1.a.7	\$25,000	\$0
	8. North of HWY 12 Sediment Analysis	II.J.1.a.8	\$0	\$0
	9. Army COE Peer Review	II.J.1.a.9	\$0	\$0
	Subtotal SPHC IM Design - II.J.1.a		\$85,000	\$0
	b. SPHC IM Construction	II.J.1.b		
	1. PPC Temporary Bypass Construction	II.J.1.b.1	\$0	\$0
	3. COEH Water Main Construction	II.J.1.b.3	\$0	\$0
	5. Easements and Rights-of-Way	II.J.1.b.5	\$30,000	\$7,500
	6. Water Delivery - Negotiations	II.J.1.b.6	\$25,000	\$6,250
	7. Water Delivery - Settlement	II.J.1.b.7	\$0	\$0
	8. NW Energy - East Bench Distribution Lines	II.J.1.b.8	\$0	\$0
	Subtotal SPHC IM Construction - II.J.1.b		\$55,000	\$13,750
	c. SPHC IM O&M	II.J.1.c		
	1. PPC Bypass O & M	II.J.1.c.1	\$50,000	\$12,500
	Subtotal PPC Bypass O&M - II.J.1.c		\$50,000	\$12,500
	Subtotal SPHC IM Design & Construction - II.J.1		\$190,000	\$26,250

Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2015 Final Budget	First Quarter 2016 Estimate
J Interim Measures (IMs) Planning, Engineering, Permitting & Construction	2. ET Cover System IM	II.J.2		
	a. ET Cover System IM Design	II.J.2.a		
	3. ET Cover System, ICS 2 and Phase 3 Design	II.J.2.a.3	\$80,000	\$0
	4. Stormwater Management/Permitting	II.J.2.a.4	\$45,000	\$11,250
	5. NW Energy Coordination	II.J.2.a.5	\$25,000	\$0
	8. ICS 1 Design, Bid and Award	II.J.2.a.8	\$0	\$0
	9. Source Material Sampling & Analysis	II.J.2.a.9	\$25,000	\$0
	Subtotal ET Cover System IM Design - II.J.2.a		\$175,000	\$11,250
	b. ET Cover System IM Construction	II.J.2.b		
	1. Demolition Phase I Construction	II.J.2.b.1	\$0	\$0
	3. Demolition Phase II Construction	II.J.2.b.3	\$0	\$0
	7. NW Energy Utility Relocate	II.J.2.b.7	\$500,000	\$0
	8. ICS 1 Construction	II.J.2.b.8	\$30,000	\$0
	9. ET Cover, ICS 2 and Phase 3 Demo Construction	II.J.2.b.9	\$0	\$0
	Subtotal ET Cover System IM Construction - II.J.2.b		\$530,000	\$0
	c. ET Cover System O&M	II.J.2.c		
	1. ET Cover System O & M	II.J.2.c.1	\$25,000	\$6,250
	Subtotal PPC Bypass O&M - II.J.2.c		\$25,000	\$6,250
	Subtotal ET Cover System IM Design & Construction - II.J.2		\$730,000	\$17,500
	3. Source Removal IM	II.J.3		
	a. Source Removal IM Design	II.J.3.a		
	1. Source Removal Decision Model	II.J.3.a.1	\$15,000	\$0
	3. Source Removal Design	II.J.3.a.3	\$130,000	\$32,500
	5. Tito Park Permitting	II.J.3.a.5	\$10,000	\$0
	6. Wilson Ditch Remedy	II.J.3.a.6	\$40,000	\$0
	Subtotal Source Removal IM Design - II.J.3.a		\$195,000	\$32,500
	b. Source Removal IM Construction	II.J.3.b		
	1. Tito Park Construction	II.J.3.b.1	\$20,000	\$0
	2. Wilson Ditch Remediation	II.J.3.b.2	\$0	\$0
	3. Source Removal	II.J.3.b.3	\$0	\$0
	Subtotal Source Removal IM Construction - II.J.3.b		\$20,000	\$0
	c. Source Removal O&M	II.J.3.c		
	1. Tito Park O & M	II.J.3.c.1	\$25,000	\$6,250
	Subtotal Source Removal IM (Design & Construction) - II.J.3		\$240,000	\$38,750
	4. IM/RCRA Support	II.J.4		
	a. IM Work Plan(s)	II.J.4.a	\$75,000	\$18,750
	b. Corrective Measures Study	II.J.4.b	\$1,211,000	\$302,750
	d. Controlled GW Area	II.J.4.d	\$258,000	\$64,500
	g. Long-term Planning	II.J.4.g	\$100,000	\$25,000
	h. Phase II RFI/Soil Characterization (CMS Parcels)	II.J.4.h	\$210,000	\$52,500
	j. Efforts to Avoid MBTA Non-Compliance	II.J.4.j	\$100,000	\$25,000
	Subtotal IM/RCRA Support - II.J.4		\$1,954,000	\$488,500

Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2015 Final Budget	First Quarter 2016 Estimate
J Interim Measures (IMs) Planning, Engineering, Permitting & Construction	5. Design Management/Execution	II.J.5		
	a. Project Management/IM Development	II.J.5.a	\$390,000	\$97,500
	b. Schedule	II.J.5.b	\$51,000	\$12,750
	c. Financial Affairs and Management Reports	II.J.5.c	\$115,000	\$28,750
	d. Sub-contracting	II.J.5.d	\$31,000	\$7,750
	e. SOW/PO Development	II.J.5.e	\$0	\$0
	f. Direct Expenses	II.J.5.f	\$30,000	\$7,500
	g. ROM Cost Estimate Update	II.J.5.g	\$0	\$0
	h. Project Insurance Premium	II.J.5.h	\$200,000	\$0
	j. IM Operations and Support	II.J.5.j	\$73,000	\$18,250
	Subtotal Design Management/Execution - II.J.5		\$890,000	\$172,500
	Total All IMs Design & Construction - II.J		\$4,004,000	\$743,500
K Documents & Records	1. System Set-up	II.K.1	\$23,500	\$0
	3. System Maintenance	II.K.3	\$36,000	\$9,000
	Subtotal Documents & Records - II.K		\$59,500	\$9,000
M CERCLA Compliance	1. CERCLA/ROD Compliance	II.M.X	\$76,800	\$19,200
	Subtotal CERCLA Compliance - II.M		\$76,800	\$19,200
N Financial Affairs	1. CPA Services	II.N.1	\$45,000	\$11,250
	2. Design and Construction Audit Service	II.N.4	\$60,000	\$15,000
	Subtotal Financial Affairs - II.N		\$105,000	\$26,250
O Redevelopment	1. Redevelopment Plans	II.O.1	\$10,000	\$2,500
	2. Redevelopment Support	II.O.2	\$10,000	\$2,500
	3. Redevelopment Issues	II.O.3	\$10,000	\$2,500
	Subtotal Redevelopment - II.O		\$30,000	\$7,500
P Community Relations	1. General Meetings	II.P.1	\$4,000	\$1,000
	2. RCRA Annual Public Meeting	II.P.2	\$4,000	\$1,000
	3. East Helena Website	II.P.3	\$10,000	\$2,500
	4. Community Involvement/Relations Plan	II.P.4	\$20,000	\$5,000
	5. Other CR activities	II.P.5	\$35,000	\$8,750
	Subtotal Community Relations - II.P		\$73,000	\$18,250
R Legal Support	1. Outside Council Fees & Expenses	II.R.1	\$67,080	\$16,770
	2. In-house Legal Services	II.R.2	\$45,000	\$11,250
	Subtotal Legal Support - II.R		\$112,080	\$28,020
T Trustee Management	4. GW and PPC Project Management	II.T.4	\$80,160	\$20,040
	6. Compliance Manager	II.T.6	\$56,160	\$14,040
	7. Operations Manager	II.T.7	\$87,750	\$21,938
	8. Operations Support Specialist	II.T.8	\$36,265	\$9,066
	9. Project Controls/Financial Affairs Coordinator	II.T.9	\$175,968	\$43,992
	11. Trustee Management EH Clean Up	II.T.11	\$439,764	\$109,941
	12. Trustee Land Use & Re-use	II.T.12	\$93,600	\$23,400
	13. Trustee Travel and Directs	II.T.13	\$35,000	\$8,750
	Subtotal Trustee Management - II.T		\$1,004,667	\$251,167
Final 2015 Budget/1Q2016 Estimate - East Helena Cleanup Account:			\$6,110,842	\$1,248,710
Total 2015 Amounts That Require Prior EPA Approval:			\$980,000	
2015 Final Budget East Helena Cleanup Account Excluding Amounts That Require Prior EPA Approval:			\$5,130,842	